

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

GRACE ADAMS, JOHN CROCKETT,
HUMZA AL-HAFEEZ, RONALD L.
KERKSTRA, PATRICIA CRENSHAW,
MATTHEW CRUISE, BARBARA CRUISE,
CATHRYN LAFAYETTE, RUTHANN
FITZGIBBONS, PATRICK FITZGIBBONS,
MARILYN JUDAH,

Plaintiffs,

v.

U.S. BANK, N.A., SPRINGLEAF
FINANCIAL SERVICE/AIG (formerly
Wilmington Finance, a division of AIG),
ALLY, GMAC, POPULAR BANK,
COUNTRYWIDE, BANK OF AMERICA,
NA, WELLS FARGO, FEDERAL
NATIONAL MORTGAGE ASSOCIATION
(FNMA; OTCQB: FNMA) MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC., (MERS), CITIMORTGAGE,
SETERUS, INC., DOES 1 THROUGH 100,
INCLUSIVE,

Defendants.

Case No. 1:12-cv-04640 (KAM) (LB)

**NOTICE OF MOTION TO SEVER AND
TO TRANSFER VENUE, OR IN THE
ALTERNATIVE, TO DISMISS, OF
DEFENDANTS U.S. BANK, N.A., AND
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.**

Document Filed Electronically

TO: All Counsel of Record
Grace Adams, John Crockett, Humza Al-Hafeez, Ronald L. Kerkstra, Patricia Crenshaw,
Matthew Cruise, Barbara Cruise, Cathryn Lafayette and Marilyn Judah

PLEASE TAKE NOTICE that on November 3, 2012, at 10:00am, or as soon thereafter as counsel may be heard, at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, Defendants U.S. Bank, N.A. and Mortgage Electronic Registration Systems, Inc. (collectively "Defendants") will move, by and through their undersigned attorneys, before the Honorable Kiyoo A. Matsumoto, pursuant to Federal Rules of Civil Procedure 20 and 21, to sever *pro se* Plaintiff Grace Adams' claims

against Defendants and to transfer venue to the Eastern District of Michigan, or in the alternative, to dismiss the action pursuant to Federal Rule of Civil Procedure 12(b)(6).

PLEASE TAKE FURTHER NOTICE that, in connection with this motion, Defendants will rely on their Memorandum of Law, exhibits attached thereto, and any papers they submit in reply to any opposition filed by Plaintiffs.

Dated: October 5, 2012

Respectfully submitted,

DUANE MORRIS LLP

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